

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONALD BERDEAUX and CHRISTINE
GRABLIIS, Individually and on Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

ONECOIN LTD., RUJA IGNATOVA,
KONSTANTIN IGNATOV, SEBASTIAN
GREENWOOD, MARK SCOTT, IRINA
ANDREEVA DILINSKA, DAVID PIKE, and
NICOLE J. HUESMANN,

Defendants.

Case No. 19 Civ. 04074 (VEC)

DECLARATION OF WENDY H. SCHWARTZ

I, Wendy H. Schwartz, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am a member in good standing of the Bar of the State of New York and am a partner at the law firm Binder & Schwartz LLP, which is currently counsel of record for Defendant Mark Scott.

2. I submit this declaration in support of the Stipulation and [Proposed] Order Granting Substitution of Counsel (the “Stipulation and Order”) to substitute the law firm of Mintz & Gold LLP and its attorney, Steven G. Mintz, as counsel of record for Mr. Scott in this action in place of its current counsel.

3. Mr. Scott has consented to the substitution, as evidenced in the signed Stipulation and Order accompanying this declaration.

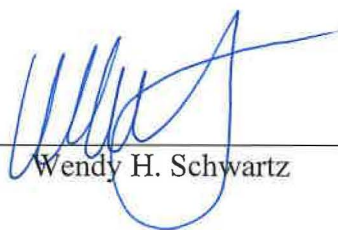
4. This case is currently in its early stages, with a number of other defendants yet to be served with process, and substitution of counsel will cause no delay in the proceedings.

5. Binder & Schwartz LLP and Mintz & Gold LLP have both executed the [Proposed] Stipulation and Order accompanying this Declaration.

6. Binder & Schwartz LLP is not asserting a retaining or charging lien.

WHEREFORE, it is respectfully requested that the Stipulation and Order be granted.

Dated: January 27, 2020



Wendy H. Schwartz